

## **Privacy Policy**

Effective date: May 1, 2023

Our services are provided to you by Inhanser (Thailand) Co., Ltd. and ProperDee Co., Ltd., Thailand companies (herein referred to as "Travel" or "Hotels", "we," "us," "our") through our websites (the "Sites," including mobile Sites and mobile applications and affiliate websites), subject to the following Privacy Policy ("Privacy Policy" or "Privacy"), which may be updated by us from time to time without prior notice to you. You should periodically visit this page to review the current Privacy Policy so you are aware of any revision to which you are bound.

The Travel Terms of Service located at the Sites is incorporated by reference into this Privacy Policy. BY USING THE SITES AND ITS SERVICES, YOU AGREE TO THESE TERMS; IF YOU DO NOT AGREE, DO NOT USE THE SITES OR ANY OTHER INHANSER SERVICES.

In addition, when using certain services and/or features, you shall be subject to any additional terms applicable to such services that may be posted on the Sites from time to time, including, without limitation, the Terms of Service and other policies. All such terms are hereby incorporated by reference into these Terms. Travel is located in the Kingdom of Thailand. Our address is 47 Srisothorn Building, 3rd Floor, Unit 3E, Sukhumvit Soi 23, Sukhumvit Road, Klongtoey nuea, Wattana, Bangkok 10110 Thailand. Such address may be changed from time to time without prior notice to you.

### **The Service**

Through the Site, Inhanser provides an online platform where you can browse different types of hotels, resorts, temporary accommodation and lodging, tour packages, airline travel, rental vehicles, prepaid credits, vouchers for prepaid sim-card, experiences and tours, or other services ("Services") in cooperation with various companies who demonstrate large consumer online traffic. Users can make bookings of services provided by hotels, resorts, airlines, train or other transportation operators, events promoters, tourist attraction operators, travel agencies, telecommunication operators and/or any other service providers ("Vendors") on the Site. By placing an order through the Site, you will be able to book and/or purchase the airline tickets, train or other transportation tickets, accommodation and lodging, event entrance tickets, tourist attraction entrance tickets, tour packages, prepaid credits, vouchers for prepaid sim-card, experiences and tours, or other services. We will provide a booking confirmation via email. We reserve the right to refuse the booking in accordance with these Terms.

Our Service may also integrate with, incorporate or otherwise link to products and services offered by third parties, including but not limited to a web-to-print product vendor, as further described below. Such third-party products and services may be subject to the additional and/or alternate terms and conditions and privacy policies of the third-party providers. Unless explicitly stated otherwise, any new features that augment or enhance the current Service, shall be subject to the Terms. To the extent you access the Service through a mobile or wireless device, your carrier's standard charges, data rates and other fees may apply.

When you use Travel, you may provide us with information, including, but not limited to, personally identifiable data, such as your name, email address, postal address, phone number and credit card information, deposit account, IP address, your address book and your photographs, and your User Content (defined below) (collectively, "Personal Data"), and other information that is collected from Sites visitors. This Privacy Policy is meant to help you understand what data we collect, why we collect it, and what we do with it. When you visit the Sites or use our Services, please be advised that your information is controlled by Travel.

### **Information we collect**

When you interact with Travel through the Sites, we may collect and store Personal Data and other information from you, as further described below:

## **Information you give us**

Your Personal Data: We collect and store Personal Data from you when you voluntarily provide such information, such as when you contact us with inquiries, respond to requests, register for an account to access the Travel Services ("Member"), sign up for a subscription or purchase products on the Sites, upload your address book, post photographs or use the Travel Services to create ads, jobs, services, property listings, videos, business cards, personalized stationery, flyers and brochures, announcements, and send, receive and/or respond to any inquiry and follow-up communications through the Service.

Personal Data about others: We collect and store Personal Data about other people that you provide to us through your use of the Travel Services.

## **Information others share about you**

We receive certain Personal Data about you from other users when they upload your contact information, send you messages, post a listing, or tag you in a photo from an event that you attended, or comment, message, review your services, or provide other information about you on the Sites.

User Content and Listing Photos/Videos: Where permitted by law, we may also collect and store Personal Data intended for public consumption that you or others upload, post, publish, or display on the Sites, including photos and videos from a listing, ad, comments, likes, text, video, gif, messages, graphics, or other materials ("User Content").

Demographic or other data: We may also collect and store demographic or other data, such as age, gender, zip code or similar information, from you when you voluntarily provide such information. Where permitted by law, we may also receive information about you from other sources, online or offline, and add it to the information you provided to us.

## **Information we get from your use of our Service**

Unregistered Users: If you are not yet a registered Member of Travel, but have received messages and/or responded to or otherwise interacted with the Sites, we collect information about you. This data is associated with the receiver's email address, mobile phone number, device identifier or any other identifier ("Receiver"). Once a Receiver registers with the Sites, he or she can save favorites archived in their dashboard and see the applicable listing.

Device information: When you use the Sites via a mobile device, we may collect and store certain information about the device you are using, including, without limitation, the applicable device identifier. We may collect and use this information to help us manage and improve the Travel Services and deliver a more customized experience to you.

Location information: The web requests you make to Travel contain your IP address. We may use such IP address for various purposes, including to: analyze and report upon the usage of our Sites and any content, features and services made available through the Sites; diagnose and prevent service or technology problems affecting our Sites; determine geographic location you are accessing our Sites; allow us to determine if we should approve your ad, and monitor and prevent fraud and abuse. Certain services, disclosures, features and third-party content made available through the Travel Services may only be available to users in certain geographic locations. Your IP address may be used to determine your location in order to determine which services, disclosures, features, third party content will be available to you.

## **Cookies and similar technologies:**

Automatically Collected Data: In addition to the Personal Data that we collect, when you interact with Travel through the Sites; we automatically receive and store certain information about your visit and use of the Travel Services ("Automatically Collected Data"). Automatically Collected Data is collected passively using various technologies such as web beacons that access or set cookies (see Cookies below) and may be used to track usage of the Sites, determine whether listings, messages or marketing emails have been opened or acted upon or customize Travel Services. The Sites may use and share such Automatically Collected Data and pool it with other information to track, for example, the total number of visitors to our Sites, the number of visitors to each page of our Sites, and the domain names of our visitors' Internet service providers. We may share Automatically Collected Data with our affiliates and current or prospective business partners, but do not share Automatically Collected Data that can be used to identify you. We do not share Personal Data with third parties except as described in this Privacy Policy.

Cookies: In operating the Sites, we may use standard technologies, including "cookies." Additionally, third-party widgets may install cookies depending on their configuration. We may (and we may allow third party service providers to) use cookies or similar technologies to collect information about your browsing activities over time and across different websites following your use of the Sites. A cookie is a piece of information that the computer that hosts our Sites gives to your browser when you access the Sites. Our cookies help provide additional functionality to the Sites and help us analyze Sites usage more accurately. For instance, our Sites may set a cookie on your browser that allows you to access the Sites without needing to remember and then enter a password more than once during a visit to the Sites. You have a variety of tools to control cookies and similar technologies, including browser controls to block and delete cookies. On most browser toolbars and within your device menu, you will find a "help" or "privacy settings" section. Please refer to this section for information on how to receive notification when you are receiving a new cookie and how to turn cookies off. We recommend that you leave cookies turned on because they allow you to take advantage of some of the Sites' features.

## **Our Use of Tracking Technologies**

We use tracking technologies for other reasons, including the following representative list:

*Sites operation purposes:* For example, enabling you to navigate around the Sites, managing your login session so you can move easily from one page to another within the Sites and your page requests are loaded in smooth and secure manner these cookies are also essential for you to access secure areas of the Sites for example to use shopping baskets or make payments.

*Performance:* For example, collecting statistical information about how you use the Sites so that we can improve the Sites; this means we can identify the number of unique visitors we receive to different parts of the Sites. We use Google Analytics to collect and provide this information by reference to a cookie id and IP of your device and the log information about the use of the Sites to measure those activity levels.

*Functionality:* For example, remembering the settings applied for a Member at login; to calculate frequency of user visits to the Sites; storing your preferences, favorites and selections; and customizing elements of the layout and/or content of the pages of the Sites for you.

*Targeting and retargeting:* For example, working with partners to manage our advertising on other websites. This may involve gathering information about the pages through our advertising partners, on other websites that you visit, and to understand when you have clicked on our advertising, it may also involve using partners to retarget our advertising to you on other websites across the internet based on your past visits to our Sites and your interest in our service.

## **Information through third party services**

Third-Party Applications and Services: Inhanser may allow you to login to our Sites using Facebook, Google, Mobile, or other third-party services (the "Login Third Party Services"). When you login through the Login Third Party Services, it may authenticate your identity and share your email address with us, which we can use to create an account for you. If you connect with our Sites using your credentials for a Login Third Party Service, we may collect certain information consistent with your privacy settings on such Service, such as your birthday, and we may provide such Service with access to data, including but not limited to your Personal Data, related to your use of the Travel Services. In some cases, Travel allows you to share information with certain recipients using Facebook Messenger, LINE, BahtSold, ProperDee, Thailand Commercial, Whatsapp, and/or other third-party services. Please remember that the manner in which the providers of third-party services use, store and disclose your information is governed by their terms of service and privacy policies, and that we will have no liability or responsibility for the privacy practices or other actions of providers of third-party services.

## **Information you share**

Travel Services lets you share information with others through the Services and Sites including reservations, listings, analysis, reports, messages, follow-up communications, photos, videos, and User Content.

## **How we use and share information we collect**

Travel uses the Personal Data we collect to provide Travel Services which you can access on the Sites. In addition, Travel may use and/or share your Personal Data with certain third parties, as described further below:

## **To provide and improve the Travel Services**

Your Personal Data: We use your Personal Data to provide the Travel Services. If you provide Personal Data in order to register with Travel, we will use your Personal Data to provide you access to such Services, to monitor your use of such Services and to contact you regarding your use of such Services. If you provide Personal Data for a certain reason, we may use the Personal Data in connection with the reason for which it was provided. If you contact us by email, we will use the Personal Data you provide to answer your question or resolve your problem. If you make a reservation or purchase on the Sites, Travel or its authorized service provider may use financial information or payment method to process such payment, to protect against or identify possible fraudulent transactions, and otherwise as needed to manage our business.

Personal Data about others: We use Personal Data about others to provide the Travel Services in sending, receiving and responding to inquiries, listings, postings, and messages. Travel may use guests' contact information to offer Members and guests the opportunity to contact each other through the Sites.

Site's analytics: Travel and its subsidiaries and affiliates may also use your Personal Data and other information collected through the Sites for analytics for the internal purpose of improving Travel Services including content and functionality, and to better understand our users.

Transactional and marketing emails and other communications from Travel and certain third parties: If your interaction with the Sites includes providing your email and/or another person's email, Travel in providing its Services, may use those emails to send transactional emails to both Members and Receivers, including sending and responding to messages, emails, follow-up communications, and account-related emails to Members. Sending, receiving and responding to transactional email communications is inherent in Travel' Services.

Regarding other non-email communications Members and Receivers agree that Travel, its subsidiaries, affiliates and current or prospective business partners may use Personal Data to tell you about products and services you have expressed interest in, or for which we believe you will be interested in the future, including but not limited to serving off-Sites advertisements related to such products and services.

## **For external processing**

Aggregated Data: In an effort to understand and serve the needs of the users of Travel Services, Travel analyzes customer demographics, interests and behavior based on the Personal Data and other information provided to us. This research may be compiled and analyzed on an aggregate basis (the "Aggregate Data"), and Travel may share this Aggregate Data with its affiliates, agents and business partners. Travel may also disclose Aggregate Data in order to describe our services to current and prospective business partners, and to other third parties for other lawful purposes.

Agents, consultants and related third parties: Travel, like many businesses, sometimes hires other companies to perform certain business-related functions. Examples of such functions include delivering our communications, maintaining databases, analyzing data, marketing, and processing payments. When we do retain another company, we only provide them with the information that they need to perform their specific function, and they may only use such information for our benefit and the purposes for which they were engaged.

Business partners: Travel may offer certain functionality or third-party products or services for which we or your agent thinks you may be interested. Travel may receive compensation in connection with the offering and/or your purchase of such functionality, products or services and may share information for the purpose of verifying any compensation we may receive.

Business transfers: If we are involved in a merger, acquisition, due diligence, reorganization, bankruptcy, receivership, sale of company assets or transition of service to another provider, your information, including Personal Data, may be sold or transferred as part of such a transaction as permitted by law and/or contract.

## **For legal reasons**

Travel may disclose your Personal Data if required to do so by law or in the good faith belief that such action is necessary to (i) comply with a legal obligation or a government request, (ii) verify compliance with or enforce our Terms of Service or protect and defend the rights or property of Travel, users of the Sites or others (iii) act in urgent circumstances to protect the personal safety of users of the Sites or the public, or (iv) protect against legal liability.

## **Information security**

Travel takes reasonable steps (including physical, electronic and procedural measures) to protect the Personal Data provided via the Sites from loss, misuse, and unauthorized access, disclosure, alteration, or destruction. Travel uses industry-standard SSL-encryption to protect data transmissions. Please note that this is not a guarantee that such information may not be accessed, disclosed, altered or destroyed by breach of such firewalls and secure server software. No Internet or email transmission or electronic storage of information is ever fully secure or error free. In particular, information sent to or from this Sites via email may not be secure. Therefore, you should take special care in deciding what information you send via the Sites or the Travel Services. Please keep this in mind when disclosing any Personal Data to Travel via the Internet.

## **When this Privacy Policy applies**

This Privacy Policy applies when you are using or visiting Travel Sites and Services globally. If you are using or visiting the Sites from a country outside the Kingdom of Thailand, you acknowledge and agree that Personal Data and other information may be transferred from your current location to the offices and servers of Travel and its authorized third-party business vendors located globally, including in the Kingdom of Thailand, and processed globally. By accessing the Sites, using the Travel Services, or otherwise providing your information to Travel, you consent to any transfer and processing in accordance with this Privacy Policy.

## **Your Rights Under this Privacy Policy**

You have the following rights:

1. The right to withdraw your consent for giving Personal Data at any time.
2. The right to be informed of request access to the Personal Data Travel process about you. Including the right to request Travel to provide the acquisition of Personal Data. However, Travel may deny such right subject to an exception by applicable laws or court order.
3. The right to receive a copy of your Personal Data which has been provided to us in structured commonly used and machine-readable format.
4. The rights to object to Travel processing your Personal Data where we no longer have a legitimate or legal need to process it. Including the right to object to your Personal Data being processed for direct marketing purposes.
5. The right to request Travel to delete or destroy your Personal Data where your Personal Data is no longer necessary in relation to the purposes they were collected or processed, or where the processing is unlawful.
6. The right to request that Travel temporarily or permanently stop processing all or some of your Personal Data.
7. The right to request Travel to correct or change your Personal Data that is inaccurate in order to keep such data up to date.

## **Data Protection Officer**

Travel has undertaken the Kingdom of Thailand Personal Data Protection Act B.E. 2562 by appointing the Data Protection Officer (DPO) to monitor the operation of Travel with respect to the collect, use and disclose Personal Data in accordance with the Personal Data Protection Act B.E. 2562, including relevant personal data protection laws.

## **Children**

Travel does not knowingly collect Personal Data from children under the age of 13. If you are under the age of 13, you may not submit any Personal Data through the Sites. We encourage parents and legal guardians to monitor their children's Internet usage and to help enforce our Privacy Policy by instructing their children never to provide Personal Data on this Sites without their permission. If you have reason to believe that a child under the age of 13 has provided Personal Data to Travel through this Sites, please contact us, and we will endeavor to delete that information from our databases.

## **Links to other Websites**

This Privacy Policy applies only to the Sites. This Sites may contain links to other web Sites not operated or controlled by Travel (the "Third Party Sites"). The policies and procedures we described here do not apply to the Third-Party Sites. The links from this Sites do not imply that Travel endorses or has reviewed the Third-Party Sites. We suggest contacting those Sites directly for information concerning their privacy policies.

## **Changes**

The Sites and our business may change from time to time. As a result, at times it may be necessary for Travel to make changes to this Privacy Policy. Travel reserves the right to update or modify this Privacy Policy at any time and from time to time without prior notice. Please review this policy periodically, and especially before you provide any Personal Data. This Privacy Policy was last updated on the date indicated above. Your continued

use of the Sites after any changes or revisions to this Privacy Policy shall indicate your agreement with the terms of such revised Privacy Policy.

### **Access to information**

If you have a registered account with the Travel Sites, you may keep your Personal Data accurate, current, and complete by logging into your account. You may also contact us as specified below. We will take reasonable steps to update or correct Personal Data in our possession that you have previously submitted through the Sites. You also may choose to close your account at any time by submitting a request under your "Account Information" on the Sites. After you close your account, you will not be able to log into the Sites or access any of your information. However, you can open a new account at any time, or if you want to re-open closed account please email us at [support@Inhanser.com](mailto:support@Inhanser.com), we may still retain any and all information associated with your account for any purpose, take actions we deem necessary to protect the integrity of the Sites or our users, to enforce our Terms of Service or otherwise permitted by law. In addition, if certain information has already been provided to Third Party Sites, as described in this Privacy Policy, retention of that information will be subject to those Third Party Sites policies.

### **How Long We Keep Your Data**

We keep your personal data only as long as we need to. How long we need your personal data depends on what we are using it for, as set out in this Privacy policy. For example, we may need to use it to answer your queries about a subscription or service and as a result may keep personal data while you are still using our services. We may also need to keep your personal data for accounting purposes, for example, where you have bought a package or a subscription. If we no longer need your data, we will delete it or make it anonymous by removing all details that identify you. If we have asked for your permission to process your personal data and we have no other lawful grounds to continue with that processing, and you withdraw your permission, we will delete your personal data. However, when you unsubscribe from marketing communications, we will keep your email address to ensure that we do not send you any marketing in future.

### **Contacting Travel**

Please also feel free to contact us if you have any questions about this Travel' Privacy Policy or the information practices of the Sites. You can reach us at [support@Inhanser.com](mailto:support@Inhanser.com).